

Btzalel Hirschhorn, Esq.

Matthew J.

Application granted. An Amended Scheduling Order will be separately docketed. The parties are directed to file a Stipulated Confidentiality Agreement and Protective Order that is signed by counsel for all parties.

SO ORDERED.



Dated: White Plains, New York September 5, 2024

Via ECF

The Honorable Phillip Halpern United States District Court, Southern District of New York Hon. Charles L. Brieant Jr. Federal Building and Courthouse 300 Quarropas Street White Plains, New York 10601

Re: Equitable Financial Life Insurance Company v. Triantafillou et al.

Docket No. 7:23-7905

Dear Judge Halpern,

This firm represents Alysha Triantafillou, and Alysha Triantafillou As Administratrix of The Estate of Ioannis Triantafillou in the above-captioned matter.

Following entry of the Civil Case Discovery Plan and Scheduling Order (ECF # 65), the Parties exchanged and responded to each others document and interrogatory demands.

Currently the deadline to complete fact discovery is September 3, 2024, and the deadline to complete expert discovery is October 18, 2024.

The appearing parties are respectfully submitting a new proposed Discovery and Scheduling Order.

I served subpoenas on several financial institutions as well as on Equitable Financial Life Insurance Company ("Equitable"). The reason for extension of discovery is because without the documents responsive to subpoenas, it will be impossible to conduct effective deposition of the parties. The parties have tentatively agreed to hold party depositions on October 15, and October 30, respectively.



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In addition, the parties are respectfully requesting the proposed confidentiality Order to be entered, as Equitable requires it before it can produce documents responsive to the subpoena.

Therefore, on behalf of myself and all parties involved in this action, I am respectfully requesting Your Honor to grant the parties extension to complete discovery.

Thank you

Sincerely,	
/s/ Kadochnikov	
Alexander Kadochnikov	